

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MIKE SHALES, et al.,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
v.)	NO. 11 C 0594
)	
TRENCH RITE, INC.,)	JUDGE RONALD A. GUZMAN
an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, TRENCH RITE, INC., an Illinois corporation, in the total amount of \$42,011.00, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$2,433.00.

On February 3, 2011, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Karen Genskie) at its place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on February 24, 2011.

On March 10, 2011, Defendant's counsel filed Defendant's Answer to Complaint. On July 6, 2011, Defendant's counsel filed its Motion to Withdraw as Counsel. On July 11, 2011, this Court granted the motion of DiMonte & Lizak, LLC to withdraw as counsel for Defendant. Accordingly, the answer filed on March 10, 2011 is stricken.

As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Catherine M. Chapman

Catherine M. Chapman
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 19th day of July 2011:

D & L Company Agents, Inc., Registered Agent
Trench Rite, Inc.
216 W. Higgins Road
Park Ridge, IL 60068

Trench Rite, Inc.
361 Renner Drive
Elgin, IL 60123-6901

/s/ Catherine M. Chapman _____

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